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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON MALDONADO, JR., AND JESUS
ANTONIO MUNOZ,

Defendants.

CASE NO. 1:23-CR-169 JLT-SKO

STIPULATION AND ORDER REGARDING
EXCLUDABLE TIME PERIODS UNDER SPEEDY
TRIAL ACT

DATE: April 17, 2024
TIME: 1:00 p.m.
COURT: Hon. Sheila K. Oberto

STIPULATION

1. By previous order, this matter was set for status on April 17, 2024.
2. By this stipulation, defendants now move to continue the status conference until May 29, 2024, and to exclude time between April 17, 2024, and May 29, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes 275 Bates Stamped pages of material, including recordings and photographs. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.
 - b) Counsel for defendant MUNOZ has indicated that his client accepts the government's plea offer. However, counsel for defendant MUNOZ requires additional time to travel to meet with the defendant and review the plea agreement.

1 c) Counsel for defendant MALDONADO desires additional time to consider the
2 government's plea offers dated September 6, 2023.

3 d) Counsel for defendants believe that failure to grant the above-requested
4 continuance would deny them the reasonable time necessary for effective preparation,]taking
5 into account the exercise of due diligence.

6 e) The government does not object to the continuance.

7 f) Based on the above-stated findings, the ends of justice served by continuing the
8 case as requested outweigh the interest of the public and the defendant in a trial within the
9 original date prescribed by the Speedy Trial Act.

10 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
11 et seq., within which trial must commence, the time period of April 17, 2024 to May 29, 2024,
12 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
13 because it results from a continuance granted by the Court at defendant's request on the basis of
14 the Court's finding that the ends of justice served by taking such action outweigh the best interest
15 of the public and the defendant in a speedy trial.

16 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
18 must commence.

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1 IT IS SO STIPULATED.

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3 Dated: April 9, 2024

PHILLIP A. TALBERT
United States Attorney

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5 /s/ KAREN A. ESCOBAR
KAREN A. ESCOBAR
6 Assistant United States Attorney

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8 Dated: April 9, 2024

/s/ Alekxia L. Torres Stalling
Alekxia L. Torres Stalling
Counsel for Defendant
9 Ramon Maldonado, Jr.

10 Dated: April 9, 2024

/s/ Roger Shahriar Bonakdar
Roger Shahriar Bonakdar
Counsel for Defendant
11 Jesus Antonio Munoz
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15 **ORDER**

16 IT IS SO ORDERED.

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18 DATED: 4/10/2024

Sheila K. Oberto
The Honorable Sheila K. Oberto
19 UNITED STATES MAGISTRATE JUDGE
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